

1 TIMOTHY CHEN SAULSBURY (CA SBN 281434)  
TSaulsbury@mofo.com  
2 JOYCE C. LI (CA SBN 323820)  
JoyceLi@mofo.com  
3 IAN A. BENNETT (CA SBN 346555)  
IBennett@mofo.com  
4 CLINTON W. EWELL (CA SBN 353961)  
CEwell@mofo.com  
5 MORRISON & FOERSTER <sup>LLP</sup>  
425 Market Street,  
6 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522

8 Attorneys for Defendant  
HYPERDOC INC. d/b/a RECALL.AI  
9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION  
13

14 GONG.IO, INC.,  
15 Plaintiff,  
16 v.  
17 HYPERDOC INC. D/B/A RECALL.AI,  
18 Defendant.  
19

Case No. 5:25-cv-1026-NW

**STIPULATED REQUEST FOR ORDER  
CHANGING TIME AND [PROPOSED]  
ORDER**

Judge: Hon. Noël Wise

1 Pursuant to N.D. Cal. Civil Local Rule 6-2, Defendant Hyperdoc Inc. d/b/a Recall.ai  
2 (“Recall”) and Plaintiff Gong.io, Inc., (“Gong”) file this stipulated request for an order changing  
3 time to request that:

- 4 1. The deadline for Recall to serve Invalidity Contentions (Patent L.R. 3-3 and 3-4)  
5 be extended four days from September 22, 2025 to September 26, 2025. Recall  
6 requests this extension to accommodate Defense Counsel’s limited availability due  
7 to their preparation and related travel for the jury trial in the matter *Attentive*  
8 *Mobile Inc. v. Stodge Inc. d/b/a Postscript*, C.A. No. 23-87-CJB (D. Del.), which  
9 proceeded on August 25, 2025 through August 29, 2025, in Wilmington, DE.

10 The prior time modifications in the case were rescheduling the Case Management  
11 Conference (ECF No. 19), a stipulated extension for Recall to respond to the Complaint (ECF No.  
12 23), two stipulated adjustments to the case schedule (ECF Nos. 37, 40), and a stipulated extension  
13 for Recall to file and serve its Reply in Support of its Motion to Dismiss the Amended Complaint  
14 (ECF No. 46).

15 The proposed modification does not affect any other scheduled event in this case,  
16 including hearing dates, discovery cutoffs, dispositive motion deadlines, or trial.

17 Pursuant to Civ. L.R. 6-2, a supporting declaration is attached.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Dated: September 17, 2025

MORRISON & FOERSTER LLP

2  
3 By: /s/ Joyce C. Li  
4 Joyce C. Li

5 *Attorneys for Defendant*  
HYPERDOC INC. d/b/a RECALL.AI

6 Dated: September 17, 2025

ORRICK, HERRINGTON & SUTCLIFF LLP

7  
8 By: /s/ Raghav Krishnapriyan  
9 Raghav Krishnapriyan

10 *Attorneys for Plaintiff*  
GONG.IO, INC.

11  
12  
13 **Attestation Re Electronic Signatures**

14 I, Joyce Li, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other  
15 signatories to this document, on whose behalf this filing is submitted, concur in the filing's  
16 content and have authorized this filing. I declare under penalty of perjury under the laws of the  
17 United States of America that the foregoing is true and correct.

18  
19 Dated: September 17, 2025

20 By: /s/ Joyce C. Li  
21 Joyce C. Li

**[PROPOSED] ORDER**

Good cause appearing, Gong.io, Inc and Hyperdoc Inc. d/b/a Recall.ai's Request for Order Changing Time is **GRANTED**.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:

By: \_\_\_\_\_  
Honorable Noël Wise  
United States District Judge